

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, *et al.*,

Debtors.<sup>1</sup>

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Debtor.

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Puerto Rico Electric Power Authority,

Plaintiff/ CounterclaimDefendant,

PROMESA Title III

Case No. 17-3283-LTS

(Jointly Administered)

PROMESA Title III

Case No. 17-4780-LTS

PROMESA  
Title III

Adv. Proc. No. 19-00391-LTS

(Jointly Administered)

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Puerto Rico Fiscal Agency and Financial Advisory Authority, the Official Committee Of Unsecured Creditors of all Title III Debtors, Cortland Capital Market Services, Sola LTD., Solus Opportunities Fund 5 LP, Ultra Master LTD, Ultra Nb LLC, Union de Trabajadores de la Industria Electrica y Riego Inc., and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica,

Intervenor-Plaintiffs,

v.

U.S. Bank National Association, as Trustee,

Defendant/ Counterclaim-Plaintiff,

The Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Syncora Guarantee, Inc.,

Intervenor-Defendants/ Counterclaim-Plaintiffs.

**NOTICE OF APPEARANCE AND REQUEST TO RECEIVE NOTIFICATIONS**

**PLEASE TAKE NOTICE** that, pursuant to Rule 83D(a) of the Local Civil Rules of the United States District Court for the District of Puerto Rico, Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these proceedings by Section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170 et seq., and sections 102(1) and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these proceedings by Section 301 of PROMESA, Debra O’Gorman of Quinn Emanuel Urquhart & Sullivan, LLP hereby enters her appearance in the above-captioned Title III case (the “Title III Case”) as additional counsel to Syncora Guarantee, Inc. (“Syncora”).

**PLEASE TAKE FURTHER NOTICE** that Syncora hereby requests, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, that all notices given or required to be given, and all papers served or required to be served, be served upon the undersigned counsel, in addition to their other counsel of record:

**Debra O'Gorman**  
debraogorman@quinnmanuel.com  
Admitted Pro Hac Vice  
**QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10010-1603  
(212) 849-7000  
(212) 849-7100

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only notices and papers referred to in PROMESA, the Bankruptcy Code, and the Bankruptcy Rules, but also includes, without limitation, any orders and notice of any application, complaint, demand, motion, petition, pleading, or request whether formal or informal, written or oral, and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, hand delivery, overnight carrier, or otherwise filed or made with regard to the above-captioned Title III Case and any proceedings therein, all of which are to be sent to the attorney listed above.

**PLEASE TAKE FURTHER NOTICE** that the undersigned intend that neither this Notice of Appearance and Request to Receive Notifications nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of the rights of Syncora: (i) to trial by jury in any proceeding so triable in the Title III Case or any case, controversy, or proceeding related to the Trial III Case; and (ii) to any other rights, claims, actions, defenses, setoffs, recoupments, or

remedies to which Syncora is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, recoupments and remedies are expressly reserved.

**THE UNDERSIGNED HEREBY CERTIFIES** that on this same date, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

*[Remainder of page intentionally left blank]*

RESPECTFULLY SUBMITTED.

DATED: May 9, 2023

**/s/Sylvia M. Arizmendi**  
USDC-PR 210714  
arizmendis@reichardescalera.com

**/s/Debra O'Gorman**  
Admitted *Pro Hac Vice*  
debraogorman@quinnemanuel.com

**REICHARD & ESCALERA**  
**Rafael Escalera**  
USDC No. 122609  
escalera@reichardescalera.com  
**Carlos R. Rivera-Ortiz**  
USDC-PR 303409  
riverac@reichardescalera.com

255 Ponce de León Avenue  
MCS Plaza, 10th Floor  
San Juan, Puerto Rico 00917-1913

*Local Counsel to Syncora Guarantee, Inc.*

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
**Susheel Kirpalani** (*pro hac vice*)  
susheekirpalani@quinnemanuel.com  
**Daniel Salinas**  
USDC-PR 224006  
danielsalinas@quinnemanuel.com  
**Eric Kay** (*pro hac vice*)  
erickay@quinnemanuel.com

51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10010-1603

*Counsel to Syncora Guratantee, Inc.*